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11 Attorneys for Defendants
 12 PACIFIC BELL TELEPHONE COMPANY,
 AT&T SERVICES, INC., AT&T INC. and
 13 AT&T OPERATIONS, INC.

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN FRANCISCO DIVISION

19 _____)

20 JOY NWABUEZE, individually and on behalf) Case No. CV 09-01529 SI
 of a class of similarly situated individuals,)
 21 Plaintiff,)
 22 vs.)
 23 AT&T INC., a Delaware corporation;)
 24 PACIFIC BELL TELEPHONE COMPANY)
 d/b/a AT&T CALIFORNIA, a California)
 25 corporation; AT&T SERVICES, INC., a)
 Delaware corporation; AT&T OPERATIONS,)
 26 INC., a Delaware corporation; and DOES 1) First Amended Class Action Complaint
 through 21,) Filed: August 13, 2009
 27 Defendants.)
 28 _____)

1 WHEREAS, Plaintiff Joy Nwabueze (“Plaintiff”) caused the Summons and
2 Complaint in this action to be served on Defendant AT&T Inc. on April 30, 2009;

3 WHEREAS, Plaintiff subsequently filed a First Amended Complaint for Damages,
4 Declaratory and Injunctive Relief on August 13, 2009;

5 WHEREAS, Defendant AT&T, Inc. filed a Motion to Dismiss for Lack of Personal
6 Jurisdiction pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, on
7 September 18, 2009, and that motion was taken off calendar pending the resolution of the
8 Motion to Dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure filed
9 by the other Defendants and joined by AT&T Inc. in the alternative;

10 WHEREAS, in a Minute Order dated February 4, 2011, the Court terminated all
11 prior motions to dismiss and set March 18, 2011 as the date by which any such motions to
12 dismiss must be refiled, if necessary;

13 WHEREAS, parties have been engaged in discussions regarding the possible
14 dismissal without prejudice of Defendant AT&T, Inc., and require additional time to
15 complete such discussions;

16 WHEREAS, Defendant AT&T, Inc. requested, and Plaintiff agreed, to stipulate to a
17 thirty-day extension of the time, until April 18, 2011, within which Defendant AT&T, Inc.
18 must respond to the First Amended Complaint;

19 WHEREAS, the parties believe that deferring the issue of personal jurisdiction over
20 Defendant AT&T, Inc. at this time will not delay the litigation and may instead realize
21 efficiencies and judicial economy;

22 WHEREAS, the extension will not alter the date of any event or deadline already fixed by
23 Court order other than Defendant AT&T, Inc.’s response date;

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1 NOW THEREFORE, it is hereby stipulated by and between the parties, through
2 their respective counsel, that Defendant AT&T Inc. shall have until April 18, 2011, within
3 which to respond to Plaintiff's First Amended Complaint.

4 Dated: March 14, 2011.

5 PILLSBURY WINTHROP SHAW PITTMAN LLP
6 ROXANE A. POLIDORA
CONNIE J. WOLFE

7 By /s/ Roxane A. Polidora
Roxane A. Polidora
8 Attorneys for Defendant
AT&T INC.

9 Dated: March 14, 2011

KELLER GROVER, LLP
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10

JACOBS KOLTON, CHTD.
JOHN G. JACOBS
BRYAN G. KOLTON

12

DAVID SCHACHMAN & ASSOC., PC
DAVID SCHACHMAN

14

By /s/ John G. Jacobs
John G. Jacobs
15 Attorneys for Plaintiff
16 JOY NWABUEZE and the Putative Class

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18 **ATTESTATION OF SIGNATURE
(N.D. Cal. General Order 45)**

19 I, Roxane A. Polidora, hereby attest that concurrence in the filing of the following
20 document: **STIPULATED REQUEST AND [Proposed] ORDER EXTENDING**
21 **DEFENDANT AT&T, INC.'S TIME TO RESPOND TO FIRST AMENDED**
22 **COMPLAINT [Local Rule 6-2]** has been obtained from all of the signatories.

23 Dated: March 14, 2011

/s/ Roxane A. Polidora

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ORDER

2 PURSUANT TO STIPULATION, IT IS SO ORDERED. The deadline for
3 Defendant AT&T Inc. to answer or otherwise respond to the First Amended Complaint
4 shall be and is hereby extended to April 17, 2011.

5 Date: 3/14/11

6 The Honorable Susan Illston
7 United States District Judge



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CERTIFICATE OF SERVICE

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I hereby certify that on March 14, 2011, a true and correct copy of **STIPULATED
REQUEST AND [Proposed] ORDER EXTENDING DEFENDANT AT&T, INC.'S
TIME TO RESPOND TO FIRST AMENDED COMPLAINT [Local Rule 6-2]** was
electronically transmitted to the Clerk of the Court using the ECF System for filing and
transmittal of a Notice of Electronic Filing to all ECF registrants in this case.

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Kathy Stout